

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

IN RE: VALSARTAN N-
NITROSODIMETHYLAMINE (NDMA)
CONTAMINATION PRODUCTS LIABILITY
LITIGATION

Civil No. 19-2875 (RBK/JS)

ORDER

The Court having held a discovery conference with the parties on December 11, 2019; and the issues addressed being directed to the API and finished dose manufacturing defendants (hereinafter "defendants"); and this Order intending to confirm certain rulings made at the conference; and accordingly,

IT IS HEREBY ORDERED this 12th day of December, 2019, as follows:

1. By December 12, 2019, plaintiffs shall designate the 75+1 custodians from ZHP whose records should be searched.
2. By December 17, 2019 (5:00 p.m.), the parties shall serve: (1) the final version of plaintiffs' requests for documents directed to defendants¹; (2) the final list of custodians to search, and; (3) the final list of search terms to use with the agreed upon protocol.
3. The in-person conference on December 18, 2019, is changed to a phone conference to start at 11:00 a.m. (EST). Plaintiffs shall arrange the conference call.
4. The January 2020 conference call with Magistrate Judge Schneider is scheduled on January 15, 2020, at 4:00 p.m.

¹ All references to "documents" shall also include ESI.

5. By January 10, 2020, ZHP shall serve plaintiffs with its proposed Mandarin translations of the Court Ordered search terms. Plaintiffs shall respond by January 24, 2020. The final list of translations shall be agreed upon by no later than January 28, 2020.
6. Defendants' sales and pricing documents shall be produced by April 1, 2020.
7. Defendants' documents responsive to plaintiffs' document requests shall be produced by May 29, 2020, except that ZHP's documents shall be produced by June 30, 2020. The documents shall be produced on a rolling basis.
8. The parties shall meet and confer regarding custodians and documents to prioritize.
9. The deadline to produce the documents listed in the November 25, 2019 Order, paragraph 6 [Doc. No. 303], is extended to January 31, 2020.
10. As to the individual personal injury plaintiffs whose responsive Fact Sheets were due before January 15, 2020, the deadline to produce responses is extended to January 15, 2020.
11. The deadline for the economic and medical monitoring class plaintiffs to respond to defendants' Fact Sheets is extended to February 3, 2020.
12. The deadline for all TPP class plaintiffs to respond to defendants' Fact Sheets is extended to March 3, 2020.

s/ Joel Schneider

JOEL SCHNEIDER

United States Magistrate Judge